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NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, PA.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LAS VEGAS SANDS, INC. n/k/a LAS  
VEGAS SANDS, LLC; and LAS VEGAS  
SANDS CORP.,

Plaintiff,

v.

NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, PA.,

Defendant.

Case No. 2:22-cv-00461-JCM-BNW  
Hon. James C. Mahan

**JOINT STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DEFENDANT'S  
TIME TO RESPOND TO COMPLAINT  
BY 30 DAYS**

**(FIRST REQUEST)**

Action Filed: March 14, 2022

Plaintiffs Las Vegas Sands, Inc. and Las Vegas Sands Corp. ("Plaintiffs") and Defendant National Union Fire Insurance Company of Pittsburgh, Pa. ("National Union") (collectively the "Parties") hereby stipulate, by and through their respective counsel of record, and subject to the

1 Court's approval, as follows:

2 1. Plaintiffs filed the Complaint in this action on March 14, 2022 (ECF #1), and National  
3 Union was served with the Summons and Complaint on March 22, 2022 (ECF #9).

4 2. National Union's current deadline to respond to the Complaint is April 12, 2022.

5 3. National Union requires additional time to prepare its response to the Complaint.

6 4. The Parties therefore agree, subject to the Court's approval, to extend the deadline for  
7 National Union to answer, move to dismiss, or otherwise respond to the Complaint by thirty (30)  
8 days, to May 12, 2022.

9 5. The Parties agree that good cause exists for this extension.

10 6. This is National Union's first requested extension.

11 **THE PARTIES HEREBY STIPULATE AND AGREE**, subject to the Court's approval,  
12 that National Union's deadline to answer, move to dismiss, or otherwise respond to the Complaint is  
13 extended to May 12, 2022.

14 DATED: April 8, 2022

KEMP JONES, LLP  
COHEN ZIFFER FRENCHMAN & McKENNA LLP

/s/ Marc T. Ladd

Marc T. Ladd  
Attorneys for Plaintiffs

18 DATED: April 8, 2022

HEJMANOWSKI & McCREA LLC  
BAUTE CROCHETIERE & HARTLEY LLP

/s/ Charles H. McCrea

Charles H. McCrea  
Attorneys for Defendant National Union Fire Insurance  
Company of Pittsburgh, Pa.

23 **IT IS SO ORDERED:**

24   
25 UNITED STATES DISTRICT JUDGE  
Hon. James C. Mahan

26 DATED: April 15, 2022  
27  
28

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**CERTIFICATE OF SERVICE**

Pursuant to FED. R. CIV. P. 5(b), I hereby certify that I am an employee of HEJMANOWSKI & McCREA LLC and that on this 8<sup>th</sup> day of April, 2022, I caused the foregoing **JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND DEFENDANT'S TIME TO RESPOND TO COMPLAINT BY 30 DAYS (FIRST REQUEST)** to be served by the Court's CM/ECF System on all parties and counsel of record.

/s/Rosalie Garcia

An Employee of  
HEJMANOWSKI & McCREA LLC

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